**Ellenoff Grossman & Schole LLP**

1345 AVENUE OF THE AMERICAS – 11TH FLOOR
NEW YORK, NEW YORK 10105
TELEPHONE: (212) 370-1300
FACSIMILE:   (212) 370-7889
www.egsllp.com

February 26, 2020

**VIA ECF**
The Honorable Sarah Netburn
United States Magistrate Judge
U.S. District Court – Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

> **Re:** *Gao v. Graceful Services, Inc. et al.*
> **Civil Case No. 18-CV-4005 (SN)**

Dear Judge Netburn,

We represent Defendants Graceful Services, Inc. and Grace Macnow (together, "Graceful I") in the above-referenced matter.  Pursuant to Your Honor's Individual Rules, ¶ I(A), Graceful I submits this letter seeking to confirm that the discovery deadline between Plaintiff and Graceful I is February 28, 2020.

Pursuant to Your Honor's Order of November 13, 2019, Graceful I understands the current discovery deadline for <u>all</u> parties is February 28, 2020. *See* ECF Dkt. 94 ("All discovery in this matter shall be completed by February 28, 2020.").

Yesterday, Plaintiff and the other Defendant, Graceful II Service, Inc. ("Graceful II"), jointly requested that the discovery deadline be extended to April 28, 2020. *See* ECF Dkt. 101. Notably, that joint letter states that discovery remains only between Plaintiff and Graceful II; not Graceful I.  *See Id*. ("Discovery in the claims against the third Defendant, Graceful II Service, Inc., is going forward").  Also, their joint letter states that "[n]o previous requests for an extension of the discovery deadline as to Graceful II, Service have been requested." (sic) *Id*.

Based on the foregoing, and to ensure that there is no confusion on this issue, we respectfully request that, in any future Order addressing the extension request of Graceful II and Plaintiff, Your Honor confirm that discovery between Plaintiff and Graceful I will end on February 28, 2020.

Respectfully yours,

ELLENOFF GROSSMAN & SCHOLE LLP

By: _____
     Ilan Weiser, Esq.

cc:  All Counsel (Via ECF)

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